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November 8, 2012

Richard E. Wiley  
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rwiley@wileyrein.com

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: *2010 Quadrennial Regulatory Review*, MB Docket 09-182

Dear Ms. Dortch:

On November 6, 2012, William S. Morris III, Chairman and Chief Executive Officer of Morris Communications Company, LLC ("Morris Communications"), William S. Morris IV, President of Morris Communications, Craig S. Mitchell, Senior Vice President of Finance for Morris Communications, and Richard E. Wiley and James R.W. Bayes of Wiley Rein LLP, counsel to Morris Communications, met with Elizabeth Andrion, acting legal advisor to Chairman Julius Genachowski, to discuss issues of concern in the above-referenced proceeding.

During the meeting, the Morris Communications representatives described the family-owned Company's journalistic heritage and commitment to serving the news and informational needs of local communities through its daily newspapers and radio broadcast stations. The Morris Communications representatives advocated repeal of the newspaper/radio cross-ownership rule, which now stands as an impediment to much-needed investment in the newspaper and radio industries and a barrier to expanding its radio portfolio in markets where it already publishes newspapers. The Morris Communications representatives stressed that more investment in radio and newspapers, and more cooperative business arrangements between them, will directly benefit the public by making more resources available to deliver local content to consumers. They also cautioned that absent relief from the newspaper/radio cross-ownership rule, the high level of local news and informational programming offered by existing newspaper/radio combinations, such as the Morris Communications properties in Amarillo, Texas and Topeka, Kansas, would likely be lost.

Moreover, the Morris Communications representatives stressed that the record at the Commission is replete with evidence that the rule is unnecessary to address any legitimate viewpoint diversity concerns. They also emphasized that retention of the ban on newspaper/radio cross-ownership would be inconsistent with the provisions

Marlene H. Dortch, Secretary

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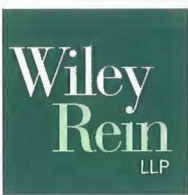
of other existing media ownership rules and proposed revisions to the ownership rules.

Respectfully submitted,



Richard E. Wiley

cc: Elizabeth Andrion



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During the meeting, the Morris Communications representatives described the family-owned Company's journalistic heritage and commitment to serving the news and informational needs of local communities through its daily newspapers and radio broadcast stations. The Morris Communications representatives advocated repeal of the newspaper/radio cross-ownership rule, which now stands as an impediment to much-needed investment in the newspaper and radio industries and a barrier to expanding its radio portfolio in markets where it already publishes newspapers. The Morris Communications representatives stressed that more investment in radio and newspapers, and more cooperative business arrangements between them, will directly benefit the public by making more resources available to deliver local content to consumers. They also cautioned that absent relief from the newspaper/radio cross-ownership rule, the high level of local news and informational programming offered by existing newspaper/radio combinations, such as the Morris Communications properties in Amarillo, Texas and Topeka, Kansas, would likely be lost.

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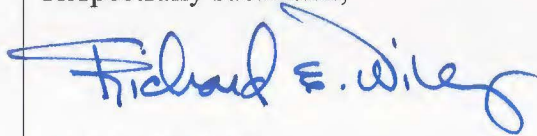
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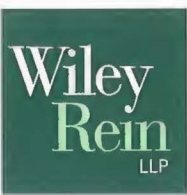
Respectfully submitted,



Richard E. Wiley

cc: Commissioner Ajit Pai  
Matthew Berry





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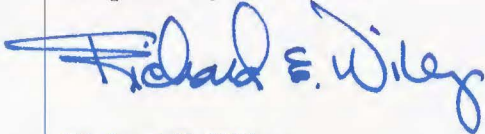
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Moreover, the Morris Communications representatives stressed that the record at the Commission is replete with evidence that the rule is unnecessary to address any legitimate viewpoint diversity concerns. They also emphasized that retention of the ban on newspaper/radio cross-ownership would be inconsistent with the provisions of other existing media ownership rules and proposed revisions to the ownership rules.

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Respectfully submitted,



Richard E. Wiley

cc: Commissioner Jessica Rosenworcel



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During the meeting, the Morris Communications representatives described the family-owned Company's journalistic heritage and commitment to serving the news and informational needs of local communities through its daily newspapers and radio broadcast stations. The Morris Communications representatives advocated repeal of the newspaper/radio cross-ownership rule, which now stands as an impediment to much-needed investment in the newspaper and radio industries and a barrier to expanding its radio portfolio in markets where it already publishes newspapers. The Morris Communications representatives stressed that more investment in radio and newspapers, and more cooperative business arrangements between them, will directly benefit the public by making more resources available to deliver local content to consumers. They also cautioned that absent relief from the newspaper/radio cross-ownership rule, the high level of local news and informational programming offered by existing newspaper/radio combinations, such as the Morris Communications properties in Amarillo, Texas and Topeka, Kansas, would likely be lost.

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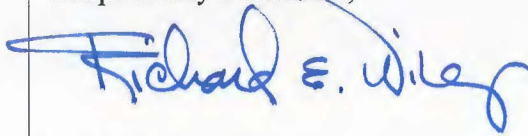
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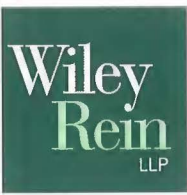
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Richard E. Wiley

cc: William T. Lake  
Hillary DeNigro  
Brendan Holland





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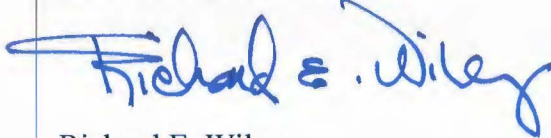
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Richard E. Wiley

cc: Commissioner Robert McDowell  
Erin McGrath